

From: Dave Bruell [mailto:david.bruell@wsrb.com]
Sent: Monday, October 19, 2009 1:41 PM
To: Nogler, Tim (COM)
Subject: RE: SBCC Public Comment Hearing in Spokane

Tim,

As I mentioned, one of the council members asked me to supply documentation for my assertion that a decision not to adopt the sprinkler requirement in the IRC could have a significant impact on funding from FEMA for hazard mitigation.

I have attached a document from FEMA entitled "FY 2010 Hazard Mitigation Assistance (HMA) Unified Guidance." This is the official document published by FEMA, available at <http://www.fema.gov/library/viewRecord.do?id=3649>, which provides guidance to communities applying for Hazard Mitigation Assistance.

I call the council's attention to section B.6, *Selection*, on page 59 (PDF page 67). This section lists some of the circumstances that can affect FEMA's consideration and prioritization of grant funding. As I pointed out in my testimony, code adoption affects a community's Building Code Enforcement Grading Schedule (BCEGS) classification; a community's BCEGS classification affects its CRS classification; and a community's CRS classification affects how much its citizens pay for flood insurance. This section from the Hazard Mitigation Assistance guide shows that a community's CRS classification, as well as its adoption and enforcement of model codes, can also affect FEMA's consideration and prioritizing of Hazard Mitigation funding.

It is important to recognize that FEMA distinguishes the CRS classification from model code adoption in this section. The act of weakening the model codes, even without an effect on the CRS classification, is enough to endanger a community's priority for funding.

Please forward this to the council, and let me know if you or the council require any more information.

David Bruell
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From: Dave Bruell
Sent: Tuesday, October 06, 2009 2:57 PM
To: 'Nogler, Tim (CTED)'
Subject: SBCC Public Comment Hearing in Spokane

Tim,

I gave testimony at the meeting yesterday. One of the council members asked me for additional information. I do not know her name, although she was one of the group that left early for the airport.

Please let the council members know that I am working on the request, and will forward it to you as soon as possible.

Thanks,

David Bruell
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B.5 Evaluation of Planning Subapplications

Completion of the “Evaluation Information” section of the planning subapplication in eGrants is required, even if the information is provided in another section of the planning subapplication. This information is used in the evaluation process.

The assessment of the frequency and severity of an event for various hazards may be better addressed by the Applicant than the subapplicant because this information is found in the hazard profile section of the Applicant’s Standard or Enhanced Hazard Mitigation Plan. The Applicant must review this information before submitting the planning subapplication and must cite the source of the information (e.g., “page 50 of the State Hazard Mitigation Plan, Hazard Identification Section”).

B.6 Selection

FEMA considers specific information in compliance with the Stafford Act when considering subapplications for selection. This information includes:

- ◆ The priority given to the subapplication by the Applicant in their PDM grant application;
- ◆ Assessment of frequency and severity of hazards;
- ◆ Whether the Applicant has a FEMA-approved State or Tribal Enhanced Hazard Mitigation Plan by the application deadline;
- ◆ Community mitigation factors such as Community Rating System (CRS) classification, agreement as a Cooperating Technical Partner, participation as a Firewise Community, and adoption and enforcement of codes including the International Code Series and National Fire Protection Association (NFPA) 5000 Code;
- ◆ The percent of the population benefiting from the mitigation project, which equals the number of individuals directly benefiting divided by the community population;
- ◆ Whether the project protects critical facilities; and
- ◆ The status of the local subapplicant as a small impoverished community.

This information may be used in the prioritization of subapplications for selection.